



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

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Order Instituting Rulemaking on the)
Commission's Own Motion into the Service)
Quality Standards for All Telecommunications)
Carriers and Revisions to General Order 133-B)
_____)

R. 02-12-004

**OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON
SCOPING MEMO ISSUES**

May 14, 2007

**THE UTILITY REFORM
NETWORK**

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The Utility Reform Network (“TURN”) submits its opening comments on the issues identified in the Assigned Commissioner’s Ruling and Scoping Memo (“ACR”) issued March 30, 2007.

I. INTRODUCTION

While many changes have occurred in the telecommunications landscape since the Commission last began to look at service quality in 2002, one thing remains at least the same, if not worse – that carriers have the upper hand in any relationship between consumers and service providers. Thus, as consumers have more choices than ever before in the technology they might choose for their communications needs, access to clear, concise information that allows consumers to make informed choices between competing services and service providers is more elusive than ever. When shopping for their communications needs consumers tend to look at three vital pieces of information – price, features and quality. While there appears to be information on the availability of features,

information on effective prices is extremely confusing and service quality data essentially remains unavailable.

TURN urges the Commission to change that situation by requiring all carriers offering voice telecommunications services in California to meet minimum service standards and to make that information freely available to consumers. By imposing such requirements, the Commission will help consumers truly reap the benefits of what competition is supposed to provide – real choices.

II. THE COMMISSION HAS AN AFFRIMATIVE RESPONSIBILITY UNDER CALIFORNIA LAW TO REQUIRE CARRIERS TO COMPLY WITH SERVICE QUALITY STANDARDS

The California Public Utilities Code (“P.U. Code”) clearly establishes that California consumers have a right to “high quality” telecommunications services¹. In fact, the Legislature has made it a statutory imperative that the Commission ensure that California consumers have access to high quality services, and information enabling them to make informed choices. The Commission must also telecommunications’ companies meet “reasonable” service quality standards. Thus, P.U. Code § 709 provides:

The Legislature hereby finds and declares that the policies for telecommunications in California are as follows:

(h) To encourage fair treatment of consumers through **provision of sufficient information for making informed choices, establishment of reasonable service quality standards, and establishment of processes for equitable resolution of billing and service problems.** (emphasis added).

Furthermore, P.U. Code § 2896 provides, in pertinent part, that:

¹ California Public Utilities Code (“P.U. Code”) § 709(a).

The **commission shall require** telephone corporations to provide customer service to telecommunication customers that includes, but is not limited to, all the following:

(a) **Sufficient information upon which to make informed choices** among telecommunications services and providers. This includes, but is not limited to, information regarding the provider's identity, service options, pricing, and terms and conditions of service. A provider need only provide information to its customers on the services which it offers. (c) **Reasonable statewide service quality standards, including, but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing.** (emphasis added).

In addition, P.U. Code § 2897 makes it clear that the “commission shall apply these policies to **all providers** of telecommunications services in California.” (emphasis added). Furthermore, the Legislature has not limited service quality requirements to any particular type of service, basic or otherwise. Thus, the requirement for the Commission to promulgate service quality standards for all providers of voice services and make information relating to such standards publicly available is not permissive, but mandatory. As TURN will discuss in more detail below, this means that all providers of voice services whether via wireline, wireless cable, VoIP, or any other technology must comply with service quality standards. Such a requirement is particularly important given that the Commission has found that wireless and VoIP are effective substitutes for at least basic telecommunications services in California.² Furthermore, the ACR’s assumption that service quality measures “should be limited to basic local exchange access line service,”³ is totally at odds with the Commission’s findings in URF that “the historic practice of defining each telecommunications service as constituting a separate “market”

² D.06-08-030, the “URF” Decision.

³ Assigned Commissioner’s Ruling And Scoping Memo (“ACR”), p. 3.

is no longer relevant in today's technologically diverse telecommunications environment."⁴ In fact, the Commission found in URF that,

Concepts like "Basic Local Exchange Service," "long distance service," "call waiting service," "call forwarding service," and "pay phone service," make little sense in an era dominated by telecommunications sold through bundled services. Wireless telephone service, for example, treats all national calls the same; includes call waiting and voice-mail as part of the basic package; and provides communications services along all major highways that were once the sole province of pay telephone providers.⁵

Thus, by the Commission's own logic, service quality measures should apply to all voice services offered by all the many and varied service providers.

III. SERVICE QUALITY STANDARDS ARE A CRITICAL ELEMENT OF A FULLY FUNCTIONING MARKET

In prior comments and replies submitted in this proceeding in 2003, TURN identified three goals that should guide the Commission in the revision of service quality standards:

- Set minimum standards that will achieve the legislative goals of high quality services for basic and advanced communications.
- Provide simple and clear information to consumers.
- Allow for automatic enforcement and empower customers to directly protect their interests.⁶

To achieve these goals, TURN proposed revisions in G.O. 133B to include measures designed to provide service quality information to customers to facilitate choice and competition, and a set of service guarantees to reflect the inconvenience that consumers experience through poor service quality when a carrier fails to meet commitments made to the customer. TURN submits that these service quality standards

⁴ D.06-08-030, p. 75.

⁵ *Id.*

⁶ "Opening Comments of TURN," April 1, 2003; "Reply Comments of TURN," May 5, 2003.

are even more important and relevant today as the telecommunications market becomes more competitive.

A lynchpin of the Commission's changing approach to telecommunications regulation is the increased reliance on competitive forces to ensure that consumers have access to high quality, affordable, state-of-the-art telecommunications services. Thus, for example with regard to the "Consumer Bill of Rights", the Commission changed its policy "to emphasize consumer education and enhanced enforcement of existing laws and regulations over prescriptive regulations as the primary means to protect consumers."⁷ Similarly, in the recent URF decision, the Commission has chosen to rely more heavily on competitive forces to produce "just and reasonable" rates for California's telephone consumers.⁸ Fundamental to these profound changes in the regulatory paradigm is consumer choice. In fact, a major rationale for the Commission's move away from regulation to more "market-based" competitive approaches is that consumer choices will be enhanced. One of the most important elements of giving consumers a choice of service providers is access to information, including facts about the relative quality of service offered by different competitors. Given that this Commission has found that wireline, wireless and VoIP telephone services are essentially the same - i.e. substitutes – then consumers should have access to the information necessary to compare these services against each other. That is the essence of the competitive market. Thus, minimum service quality standards and information allowing comparisons between how various providers have fared in meeting such standards is a critical element promoting consumer choice.

⁷ D.06-03-013, pp. 3-4.

⁸ D.06-08-030.

Given that underlying technologies for offering telecommunications services are not necessarily the same, it is not feasible that all service quality metrics will apply to all service providers. For example, the installation or repair appointments associated with wireline service is usually inapplicable to wireless service and will not always apply to VoIP unless the company is providing the VoIP router and installation services or there is a technical problem with the underlying broadband connection. However, this lack of “symmetry” should not defer the Commission from requiring different service quality indicators for each type of provider so long as the underlying purpose is to allow consumers to make informed choices. Consumers should have access to objective information that allows comparisons across a number of elements, including quality. It is the antithesis of a free market that consumers should be forced to rely solely on the marketing hype of various competitors, especially for an essential product such as communications services.

In our previous pleadings in this proceeding filed in 2003 TURN discussed the reasons why the Commission could not solely rely upon competition to ensure high service quality. While we will not repeat those arguments herein, it is important to note that Professor Harris, then SBC’s expert witness in the 1998 Commission review of G.O.133B, testified that “There is a serious misconception that competition improves service quality, raising it to some uniformly high level: IT DOES NOT. Instead, competition promotes a wide diversity of quality offerings, with higher quality services sold at higher prices, reflecting the higher costs of producing the higher quality products and services and their greater value to customers.” (Emphasis in original)⁹. Indeed, while

⁹ See Opening Comments of TURN, April 1, 2003, p. 7 citing, “Dr. Robert G. Harris, Principles of Service Quality Regulation in Retail Telecommunications Services,” August 24, 1998, p. 3. Filed as Appendix 3 to

there are some examples of industries where competition has increased quality, such as the challenge from Japanese automobiles, it is more often the case that competition fosters low quality/low price options. Some examples are “no frills” airlines, retail banking services and warehouse stores. High quality telecommunications services are essential for the public health, safety and welfare. They are critical to the efficient functioning of our state’s economy. It is not sufficient to entrust the job of ensuring high quality service to the marketplace and hope for the best.

IV. TURN’S SERVICE QUALITY PROPOSAL

As discussed in our prior comments on service quality in this docket¹⁰ customer choice is enhanced if service quality information is available in the important areas of service installation, outage repairs, answer time to queries at the business office, network availability, and billing problems. TURN proposes performance data from concrete indicators, rather than customer surveys, for reasons discussed in the survey section below. TURN proposes that data on the indicators identified below be gathered on a monthly basis, and be submitted quarterly to the Commission for publication on its website.

A. Proposals to Support Customer Choice -- Wireline Carriers

TURN proposes four indicators to assist customers in monitoring and choosing service from a wireline carrier. Given that VoIP is a “wireline” offering (be it provided by traditional telephone companies, cable TV providers or the newer stand-alone VoIP

“Opening Comments of Pacific Bell in the Commission’s OIR on Service Quality Standards for All Telecommunications Carriers and Revisions to G.O. 133-B,” August 25, 1998. R.98-06-029.

¹⁰ “Opening Comments of TURN” on April 1, 2003; “Reply Comments of TURN,” May 5, 2003.

vendors), these indicators should also be applied to VoIP services. TURN believes that for the most part, these indicators would be relevant where a consumer is subscribing to a VoIP service. However, in instances where a particular metric is inapplicable, for example, where installations do not require a physical presence by the service provider at the customer location, then that specific service quality standard should not be applied.

1. **Average Installation interval (in business days) (separate for business and residential).** This indicator measures the average interval for request for new, move or changes of service. The Commission should use the ARMIS definition (ARMIS measure in Table 43-05, row 134): Intervals where the customer requests a date later than the offered day are excluded.¹¹ Even though this measure already has a common ARMIS definition, the Commission must verify that all carriers are interpreting the definition in the same way. Evidence presented in the NRF proceeding shows that this can be a problem. For example, Verizon does installations on weekends but those days do not count toward “business days.”¹² SBC California (now AT&T) includes installation data for vertical services, such as caller ID and call waiting.¹³ We recommend that this measure exclude such vertical service installations. To the extent carriers are offering installation of services such as DSL this standard should apply to those services as well. **Goal: maximum of 3 days.**

¹¹ The ARMIS definition states: “The average interval, expressed in business days, between the date the service order was placed and the date the service order was completed during the current reporting period. This amount excludes all orders having commitment dates set by customers.”

<http://www.fcc.gov/wcb/armis/instructions/2006/definitions05.htm#T1R>.

¹² R.01-09-001/I.01-09-002, 20 RT 2529-31 Proposed Decision of ALJ Thomas. 3/12/03 at 109.

¹³ Ibid., at 47

2. **Average Out of Service Repair Interval in Hours (Including Out-of-Service and Repeat Out-of-Service Intervals). (separate for business and residential).**

This indicator shows how long a customer may have to wait to have service repaired. The Commission should use the ARMIS definition (ARMIS measure in Table 43-05, rows 144, 145, 148, and 149). **Goal: maximum 36 hours.** The proposed goal is not as strict as in some states. Texas requires that a carrier must clear 90% of out of service trouble reports within 8 working hours measured on a monthly basis;¹⁴ and Illinois requires out of service troubles on basic service to be cleared within 24 hours or the customer is receives a credit...¹⁵

3. **Average Wait Time to Speak with a Live Agent (seconds), all call topics.**

(separate for business and residential) This indicator demonstrates how rapidly a customer can expect to speak about an issue with a live agent when calling the business office. While many issues can now be resolved by the customer's choosing menu options on the company's automatic response unit ("ARU"), that makes the remaining situations, perhaps the more complex ones, more necessary to resolve with a representative. The measure must be combined with a Commission requirement that a customer must be presented with the option on the company's answering menu to speak with a live agent after no more than 45 seconds of menu choices. As is common in measurement of telephone service quality, the time count on the indicator would begin when a customer chooses to speak with a live agent. This measure must include billing calls, repair calls,

¹⁴ Chapter 26 of the Texas Administrative Code, Title 16, Part II, specifically §§26.54(c)(6).
<http://www.puc.state.tx.us/rules/subrules/telecom/26.54/26.54.doc>

¹⁵ 220 Illinois Compiled Statutes 5/13-712.

other trouble reports, and all other calls to the call center (including directory assistance). This measure is only applicable during a carrier's business hours.

Goal: Maximum 60 seconds.¹⁶

4. **CPUC Complaints per Million Customers. (separate for business and residential)** This indicator is a measure of problems that customers have with the carrier. The most frequent problems are billing issues, and complaints also cover aspects of call quality.¹⁷ While the level of actual complaints does not represent the true level of problems, because few customers actually register a complaint,¹⁸ relative levels of complaints among carriers can help customers make their own choices. That this complaint data represents real issues that customers face is demonstrated by the fact that of the complaints that were resolved in favor of one party or the other, more complaints were resolved in favor of the customer than of the utility.¹⁹

5. **Additional Call Indicators for the Commission to Monitor:** Answer time statistics alone do not reveal the entire picture of call center performance, because some calls may be blocked and not get through due to insufficient number of incoming lines, or customers may abandon due to long wait times. TURN believes that, from the consumers' perspective, these abandoned and blocked or

¹⁶ A survey by Southern California Edison showed that customer dissatisfaction increases with a 60-second average response time, and significantly increases with a 3-minute average response time. Southern California Edison 1995 Test Year General Rate Case, A.93-12-025, Workpapers to SCE-9, Vol. 3, Chapter I-III.

¹⁷ See data presented in "Opening Comments of TURN" in this docket, April 1, 2003, p. 20-22.

¹⁸ See "Reply Comments of TURN" in this docket, May 5, 2003, p. 5-8

¹⁹ Data on CPUC Informal Complaints regarding PacBell, extract covering disputed bills and quality of service, data for 1995-2000, in Direct Testimony of Gayatri M. Schilberg on Service Quality in the New Regulatory Framework, on behalf of TURN, June 28, 2002, R.01-09-001/I.01-09-002, p. 40-41.

busy calls are an indicator of performance and should be closely monitored but not included in the indicators to be advertised in support of customer choice:

1. Percent of calls receiving busy signal (all types of calls, including billing calls)
2. Percentage of abandoned calls (all types of calls, including billing calls).

Table 1

TURN Proposed Indicators for Wireline Service (Including VoIP)

Indicator	Goal
Average Installation Interval	Maximum 3 business days
Average Out of Service Repair Interval	Maximum 36 hours
Average Wait Time to Speak with a Live Agent	Maximum 60 seconds, with menu choice after maximum 45 seconds
CPUC Complaints per Million Customers	No specific goal
Percent of Calls Receiving Busy Signal	Monitor
Percent of calls Abandoned	Monitor

B. Proposals to Support Customer Choice – Wireless Carriers

For wireless carriers the installation and repair indicators proposed for wireline carriers do not apply in the same way. We do propose the same call center and complaint indicators, however, to be applied to this set of carriers.

In addition TURN recommends the wireless indicators and goals that are present in the program that has been operating successfully since 2001 in Singapore (a country with a wireless market at least as competitive as California).

- **Call success rate** – this refers to the number of successful calls established over the total number of mobile call attempts (**Goal: over 95%**).
- **Service coverage (street level)** – this is based on signal strength and refers to the network's ability in achieving a signal strength of -100 dBm or better during the mobile call holding period (**Goal: over 95%**).
- **Call drop-out** – this refers to the unintended disconnection of mobile calls by the network during a 100-second call-holding period for each call (**Goal: below 5%**).²⁰

The Cellular Network Performance Measurement System (CNPMS) of the Infocomm Development Authority (“IDA”) of the Singapore Government uses field testing to survey 47 routes including expressways, major and secondary roads/streets, and 20 HDB estates (Housing Development Board). The performance results of each mobile network are collected by means of drive tests along selected routes and HDB estates between 10 am and 8 pm on weekdays. Mobile service providers are not informed of the routes and HDB estates that are randomly selected by IDA prior to the drive tests. The car used in the drive tests is equipped with the CNPMS that automatically generates calls on the mobile telephone networks. The holding period of each test call is 100 seconds. A test call is generated 40 seconds after the previous test call is completed.

The United Kingdom (“UK”), a country also with numerous wireless providers, has implemented a somewhat different approach. Since 2006, in cooperation with the

²⁰ See the IDA website: <http://www.ida.gov.sg/Policies%20and%20Regulation/20060419202223.aspx> ; <http://www.ida.gov.sg/Policies%20and%20Regulation/20060612105256.aspx>; <http://www.ida.gov.sg/Policies%20and%20Regulation/20060424142032.aspx> .

UK's telecommunications regulatory agency Ofcom, a third party, topnetuk.org, engages in voice call testing across the UK using automated testing equipment mounted in vehicles. Calls are 90 seconds long followed by a 30 second no-call period. As in Singapore, the wireless carriers are not informed of the routes or when the testing will occur. The measures gathered during these tests are subsequently displayed and updated on the topnetuk.org website and include: call success rate (designated as a green circle on the topnetuk.org website); call drop off (designated as a green circle on the topnetuk.org website); and voice quality (acceptable or better in quality is identified as "Good Voice Quality" and designated by a small green circle; unacceptable or worse in quality is identified as "Poor Voice Quality" and designated by a small red circle).²¹

While TURN harbors no illusion that the Commission will institute a government sponsored testing program as in Singapore, the UK approach is certainly a reasonable option. In the alternative, it is clear that the wireless operators continuously monitor their networks for service quality (and attempt to compete on the basis that one provider's network is better than another). Thus, the Commission could require wireless carriers to make their own service quality measurements publicly available with random third party verification of service quality to ensure data reliability and objectivity.

²¹ See <http://www.topnetuk.org>. Also see additional details and rationale for service quality testing at the Ofcom website at: <http://www.ofcom.org.uk/consult/condocs/ocp/statement/> and http://www.itu.int/ITU-D/treg/Events/Seminars/2006/QoS-consumer/documents/SIII-1_ofcom.pdf.

Table 2 TURN Proposed Indicators for Wireless Service

Indicator	Goal
Call Success Rate	Over 95%
Service Coverage	Over 95%
Call Drop Out	Below 5%
Average Wait Time to Speak with a Live Agent	Maximum 60 seconds, with menu choice after maximum 45 seconds
CPUC Complaints per Million Customers	No specific goal
Percent of Calls Receiving Busy Signal	Monitor
Percent of calls Abandoned	Monitor

C. Service Guarantees

In addition to the service quality indicators that enable customer choice, the Commission should also implement the following service commitments to guarantee high quality to California customers. The credits compensate them in part should service not meet expectations.

1. Four-hour appointments met²² \$30. Under California Civil Code 1722, four-hour appointment times are required if the customer needs to be present, for example for an installation or repair. The credit would be automatic if the utility fails to keep the appointment.²³

²² Where the customer presence is necessary. Appointments missed due to utility cause would result in a credit to the customer's account.

²³ Many other California utilities also provide appointment guarantees: Pacific Gas & Electric, \$30; Southern California Edison \$30; San Diego Gas & Electric between \$15 and \$50 depending on the appointment type..

2. Installation for first primary line within 5 days of receipt of request or by the requested date: \$30.
3. Out of Service restored in 24 hours. \$10 for each day out of service beyond the first 24 hours.

The guarantees will not apply under conditions of serious emergency or major storm.

As discussed above, it is highly unlikely that the Commission can fashion service quality standards that are exactly the same for wireline, wireless and VoIP services. And, in fact, that should not even be a goal for the Commission in this proceeding. TURN is well aware of the Commission's objectives for competitive and technological neutrality. However, those objectives must not take precedence over the at least equally important goal of protecting and empowering consumers. To enshrine the goal of avoiding any "asymmetric" or potentially inconsistent regulations would have the Commission fall victim to Ralph Waldo Emerson's admonition that, "a foolish consistency is the hobgoblin of little minds." What is critical is that the service quality metrics the Commission does employ allow reasonable comparisons across technologies as well as ensure that all Californians have access to high-quality services.²⁴

V. QUESTIONS FROM THE ACR

A. Applicability of Reporting Requirements

²⁴ As SBC's expert Professor Harris stated: "Minimum quality standards ensure that customers will have a 'baseline' level of quality, reducing the information needed to make buying decisions. If customers know that all service providers must produce service that meets those standards, they can make better comparisons across price-quality offerings." *Id.*, Harris, p. 20.

In the ACR the Commission asks whether “non-URF ILECs and CLECs should have the same reporting requirements as URF ILECS. TURN submits that the Commission should create a rebuttable presumption that the service quality measures are applicable to all carriers. To the extent that some measures may be inapplicable to a particular type of service or size or type of carrier, for very specific and technical or financial reasons, that carrier should be given an opportunity to request an exemption from the Commission. To the extent that smaller carriers can demonstrate that complying with the service indicators would create an undue burden (for example by causing a dramatic increase in costs), the Commission could require different reporting requirements based on size. This may be particularly important for smaller ILECs in rural areas or small, fledging CLECs.

B. Customer Satisfaction Surveys

In the ACR the Commission asks numerous questions about the efficacy of customer satisfaction surveys. While TURN believes that customer satisfaction surveys could provide useful information for consumers, such surveys alone provide insufficient information to allow consumers to make optimal choices. Thus for example, a typical customer survey that asks consumers their relative satisfaction with their wireless provider offers consumers some insight into how other consumers perceive a particular company, these surveys typically fall far short of giving consumers facts about specific service quality parameters, for example the average number of dropped calls from the same wireless provider. It is this later type of information from concrete metrics that TURN submits will enable and empower consumers in the marketplace and provide a

degree of leveling of the respective bargaining power between service providers and consumers.

Furthermore customer satisfaction surveys have certain disadvantages. Customer opinions can be swayed by “feel good” tactics such as sponsorship of sports stadiums, green advertising, and the like, and thus not always represent customer satisfaction with the product provided. To the extent that external events influence customer opinion it is difficult for the utility itself to directly change its satisfaction scores.²⁵

For comparability among utilities the overall satisfaction questions would need to be designed in a similar manner. For example the response to a survey based on customers with recent transactions with the utility will be different from a survey based on customers who have not necessarily interacted with the utility recently. In order to use surveys in a meaningful way the Commission would need to decide which type of survey is appropriate. Furthermore the questions must not only be worded the same, but also appear in the same position in the survey. A customer is likely to have a different response if his overall satisfaction is judged at the beginning of the survey, rather than reliving an unpleasant utility contact by responding to questions during the transaction survey and then answering the overall satisfaction question at the end.

Whatever service quality metrics the Commission authorizes to enable customer choice, comparable data should be readily available on the Commission website and in utility bill inserts. For example, reliability data is available for California investor-owned electric utilities on the Commission website at

<http://www.cpuc.ca.gov/static/energy/electric/reliability/reliabilityreports/index.htm>.

²⁵ A PG&E executive was overheard to say that their satisfaction scores depended on whether the customer had seen “Erin Brokovich” recently, a movie that was unfavorable to PG&E.

Similar procedures could be implemented to gather monthly data on telephone service quality performance and make it available quarterly. The Commission should also encourage carriers to include service quality information with their bill inserts.

C. ARMIS and MCOT

In the ACR, the Commission asked several questions on ARMIS and MCOT. The Automated Reporting Management Information System (“ARMIS”) was created by the FCC in 1987 and now consists of ten types of public reports, covering data on finances, operations, service quality, customer satisfaction, switch down time, infrastructure and usage.²⁶ The service quality data and reports enable monitoring of a long history of performance by several subcomponents of the existing utility configurations, for residential and business customers separately.²⁷ (See table in Attachment 1 for residential customers.) This data is very useful, and two of the ARMIS indicators appear in TURN’s proposal for service quality measures applicable to wireline carriers. This data provides continuity and consistency in the picture of service quality afforded to California customers.

TURN encourages the Commission to monitor the California-specific indicators from ARMIS data for ILEC carriers. Rather than require other carriers to report this data, however, TURN recommends that all carriers report the metrics listed in the TURN proposal above. Metrics from the TURN proposal should be reported by non-URF ILECS as well as CLECs (as well as by other providers of “wireline” voice telecommunications services).

²⁶ See also <http://www.fcc.gov/wcb/armis/>.

²⁷ Preset reports are available from the menu at <http://svartifoss2.fcc.gov/eafs7/PresetMenu.cfm>.

The MCOT reports are currently produced by two California utilities – Verizon and AT&T California (See D.03-10-088 p. 121 and 124). These reports were initially created to monitor conditions after mergers. In TURN’s view these reports represent the “state of the art” on service quality. The metrics were based on a Technology Policy Subgroup of NARUC and represent indicators that have been carefully considered. Indeed, TURN’s proposed Answer Time indicator is the same as line 550 of the MCOT reports, “Average Answer Time,” which includes billing and other calls, and the monitor indicators are also MCOT lines 560 and 570.

While the reports are an important data source TURN does not find a basis for the Commission to require the two utilities to continue producing these reports, on condition that TURN’s indicators on answer time, abandoned calls and calls receiving busy signals are implemented as TURN recommends above, and TURN’s recommended indicators on installation and repair times are also approved. If those indicators are not going to be available in the future, however, the Commission should order that the MCOT reports be continued, so that this important information is at least available for two major California carriers.

D. Major Service Interruptions

In the ACR the Commission inquires whether it should require service quality monitoring of major service interruptions. It is almost a cliché to state that telecommunications services are absolutely critical to enabling our modern society to function. It has been shown time-and-again that, particularly in emergencies – whether natural such as earthquakes, fires or floods, or manmade such as terrorist actions – that a fully functioning telecommunications system is imperative. Thus, it is a “no-brainer” that

the Commission should be highly concerned with any major service interruptions and outages. As discussed above, given this Commission's belief that consumers now have access to various modes of local telecommunications services, all carriers, not just ILECs should be required to report service quality interruptions. If the Commission's predictions espoused in the URF decision come to pass, more and more consumers and businesses will be "cutting-the-cord" and relying on non-ILEC telecommunications service providers. Thus, service interruptions on those "alternative" networks – wireless, cable, VoIP – will become as important as outages that occur on the traditional wireline networks.

E. Existing Reports

As described in TURN's proposal above, the following items in Exhibit A of the ACR are considered to be very important to enable customer choice and should be required from all carriers who provide these functions. Such a reporting requirement is simple and concise.

Table 3 Continued Reporting

Line Number, ACR Exhibit A	Indicator	Comments
4	Installation Interval for Access Line Service Orders	
18 and 19 (require 11 and 12)	Initial and Repeat Out of Service Repair Interval	
27 and 28	Business Office Answering Time – billing and non-billing	MCOT line 550 includes both ²⁸
29	Percentage abandoned calls	
30	Percentage blocked (busy) calls	

In addition TURN recommends a service guarantee should apply for line 22, where four-hour appointments are not met.

As discussed in previous comments in this docket²⁹ TURN does not find some of the GO 133-B indicators, as currently defined, to still be useful (See Table 4).

Table 4 Unnecessary Requirements as Defined

Line Number, ACR Exhibit A	Indicator
1	Held access line service orders
2	Installation line-energizing commitments
10	Customer trouble reports

²⁸ The ACR's Exhibit A is incorrect that billing calls are not included in the MCOT report. Response to TURN's DR 7 Q 5a to Pacific Bell in R.01-09-001. See Schilberg testimony in R.01-09-001, June 28, 200, p. 23.

²⁹ See "Opening Comments of TURN," April 1, 2003, p. 16-17.

F. Sufficiency

The ACR requests comments on whether the concerns identified in D.03-10-088 and D.04-09-062 have been addressed.

In D.03-10-088 the Commission identified that (then) Pacific Bell had some service weaknesses for residential customers in the area of speed to resolve service outages and had been slow to answer customer billing calls. (D.03-10-088 p. 4-5). For this reason TURN's proposal includes billing calls in the answer time indicator. Furthermore TURN's proposal includes the concrete indicator on Average Out of Service Repair Interval, with service for residential and business customers identified separately, which would identify that service offered by Pacific was poor for residential customers. TURN's proposed indicator on complaints could also reflect poor service quality in these areas. Customer satisfaction surveys may or may not capture these areas of poor service, depending on the questions, and whether customers with recent service problems were sufficiently sampled.³⁰

In D.04-09-062 the Commission found that Cingular experienced coverage and capacity problems and still required customers to pay early termination fees for poor service. This is clearly an area where the proposal by TURN for service quality indicators on wireless call success rate, service coverage, and call drop out rate would have shown prospective customers that the service quality offered by Cingular was poor and would have allowed consumers to make a better choice among carriers. Monitoring complaints would also have demonstrated discontent with service levels. These phenomena would be reflected concretely in specific descriptive indicators. If the

³⁰ Unless a survey were based on recent transactions, it is unlikely that the results would register the dissatisfaction that results on transactions that were relatively infrequent, such as out of service conditions.

network problems were widespread, it is possible that a properly designed customer satisfaction survey might also capture such poor service, although not necessarily with the specificity of TURN's proposal.

VI. CONCLUSION

For the reasons stated above, TURN requests the Commission to adopt TURN's proposed service quality measures and associated service guarantees for all carriers under the Commission's jurisdiction.

Respectfully submitted

By /s/ William R. Nusbaum
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May 14, 2007

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Attachment 1

Data Run Date: 05/09/2007

Out of Service Repair Intervals in Hours (Includes Initial Out-of-Service and Repeat Out-of-Service Intervals)

CALIFORNIA , Residence										
COMPANY	STUDY AREA	1997	1998	1999	2000	2001	2002	2003	2004	2005
AT&T INC. (FORMERLY SBC) PACIFIC TELESIS GROUP Pacific Bell - California VERIZON COMMUNICATIONS VERIZON GTE Verizon California	California	46.8	50	38.2	42.8	27.3	26.1	26.1	29.1	45.8
	GTE California	16.1	15.5	13.2	16.9	22.1	22.3	30.8	41.6	61.3
	Contel California	16.1	15.3	14.8	14.7	19.9	24.6	45.5	42.2	52.8
	West Coast California	17.6	12.7	15.4	14	16.1	14.9	11.8	10.3	12
Verizon Northwest, Inc. CITIZENS COMMUNICATIONS Citizens Telecom Co. of California, Inc. Citizens Telecom of Golden State Citizens Telecom of Tuolumne	Shasta California	N/A	N/A	16.6	25	20.1	14.4	19.4	20.7	24.5
	Colusa California	N/A	22	13.1	13.3	19.4	13.3	19.5	23.5	23.9
	California	N/A	N/A	13.7	12.8	11.9	25.6	19.1	21.1	28.9
CALIFORNIA AGGREGATE		43	45.7	34.9	39.3	26.4	25.5	27.1	31.5	48.9

Data Source: ARMIS Report 43-05, Table II, Column (af), Rows 144, 145, 148, 149

CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On May 14, 2007 I served the attached:

**OPENING COMMENTS OF THE UTILITY REFORM NETWORK ON SCOPING
MEMO ISSUES**

on all eligible parties on the attached lists to **R.02.12.004**, by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this May 14, 2007, at San Francisco, California.

_____/s/_____

Larry Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION

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Proceeding: R0212004 - PUC - SERVICE QUALIT

Filer: PUC

List Name: INITIAL LIST

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